

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

ARTHUR J. GALLAGHER & CO.,

Plaintiff,

v.

ALLIANT INSURANCE SERVICES, INC.,

Defendant.

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Case No.: 1:22-cv-03931

**DEMAND FOR JURY TRIAL**

**PLAINTIFF’S MOTION FOR LEAVE TO  
FILE BRIEF IN EXCESS OF PAGE LIMIT**

Plaintiff Arthur J. Gallagher & Co. (“Gallagher”) respectfully seeks leave to exceed the 15-page limit in Local Rule 7.1 on its Memorandum of Law in Support of Plaintiff’s Emergency Motion for a Temporary Restraining Order and Preliminary Injunction (“TRO Memorandum”). In support of this Motion, Gallagher states as follows:

1. On July 28, 2022, Gallagher filed an action in this Court alleging Illinois state law claims for tortious interference with contract, tortious interference with prospective economic advantage, aiding and abetting breach of fiduciary duty, and conspiracy. (Dkt. 1.)

2. Gallagher is jointly filing with this Motion an Emergency Motion for Temporary Restraining Order and Preliminary Injunction in order to prevent Defendant Alliant Insurance Services, Inc. (“Alliant”) from continuing to, among other things, unlawfully solicit Gallagher clients and use, possess, or disclose any of Gallagher’s confidential information (“Motion for Temporary Restraining Order”).

3. Gallagher seeks leave to file its TRO Memorandum of no longer than 33 pages. Additional pages are needed to sufficiently explain the factual background of the case, detail

Alliant's unlawful "leveraged hire strategy," and to thoroughly address Gallagher's legal positions. Because Alliant's unlawful conduct is so egregious and there is so much evidence that establishes the need for injunctive relief, Gallagher requires additional pages to adequately address in the context of the Motion for Temporary Restraining Order, the grounds for which it would be successful on the merits for each of its claims against Alliant.

WHEREFORE, for the reasons set forth above, Gallagher respectfully requests leave to file a memorandum of law in support of the Emergency Motion for Temporary Restraining Order and Preliminary Injunction in excess of the 15-page limit.

DATED: July 28, 2022

Respectfully submitted,

/s/ Ronald S. Safer

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